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June 15, 2022

BY ECF AND EMAIL

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Honorable Jennifer E. Willis
United States Magistrate Judge
40 Foley Square
New York, NY 10007

Re: United States v. Chet Stojanovich,
22 Cr. 339 (DLC)

Dear Judges Cote and Willis:

I write to update the Court as directed by Judge Willis at yesterday's telephonic bail review in Magistrate's Court, prior to Mr. Stojanovich's indictment and the assignment of this case to Judge Cote.

As had been discussed, Mr. Stojanovich traveled from Arizona to Los Angeles yesterday evening. He was accompanied by his brother and bond cosigner, Paul Stojanovich. They traveled by plane with the assistance of U.S. Pretrial Services Officer Christina Venable, who provided a letter for airport personnel regarding Mr. Stojanovich's GPS ankle bracelet. Mr. Stojanovich went straight from the airport in Los Angeles to the UCLA medical center, where he was admitted to the emergency room.

Today, following an initial psychiatric evaluation, Mr. Stojanovich was placed on a 72-hour psychiatric hold. He currently remains in the emergency room as no beds are available in the psychiatric unit at UCLA. Hospital staff are seeking a bed placement for him at other psychiatric hospitals in LA county. Mr. Stojanovich continues to wear his GPS ankle bracelet from Pretrial Services.

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In light of Mr. Stojanovich's hospitalization in Los Angeles, I respectfully request that the Court not require him to appear in person for arraignment at this time. The Court can instead permit him to be arraigned by written waiver, pursuant to Rule 10(b) of the Federal Rules of Criminal Procedure, or to appear remotely for arraignment pursuant to the CARES Act once he has been discharged from the emergency room.

Respectfully submitted,

/s/
Clay H. Kaminsky
Assistant Federal Defender
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CC: AUSA David Lewis
USPSO Christina Venable